

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

DARK CATT STUDIOS HOLDINGS,
INC., a Delaware corporation, and DARK
CATT STUDIOS INTERACTIVE LLC, an
Illinois limited liability company, on behalf
of themselves and all other similarly
situated,

Plaintiff,

v.
VALVE CORPORATION, a Washington corporation ,

Defendant.

CASE NO.: 2:21-cv-00872 JCC

**STIPULATED MOTION AND
[PROPOSED] ORDER FOR
EXTENSION OF (1) NEAR-TERM
PRETRIAL DATES, AND (2) TIME
TO RESPOND TO PLAINTIFFS'
AMENDED CLASS ACTION
COMPLAINT**

**NOTE ON MOTION CALENDAR:
DECEMBER 24, 2021**

**STIPULATED MOTION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
2:21-cv-00872-JCC**

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1 In accordance with Local Civil Rules 7(d)(1) and 10(g), Plaintiffs Dark Catt Studios
2 Holdings, Inc., and Dark Catt Studios Interactive LLC (“Plaintiffs”), individually and on behalf of
3 all others similarly situated, and Defendant Valve Corporation (“Defendant”), by and through their
4 undersigned counsel, submit this Stipulation and ask the Court to enter the below order consistent
5 with this Stipulation.

6 In recognition of certain near-term pretrial dates that are approaching and the current
7 procedural status of the case with Plaintiffs’ Amended Complaint filed but not yet responded to
8 by Defendant, and counsel for the Parties having met, conferred and reached agreement on how
9 best to proceed,

10 IT IS HEREBY STIPULATED AND AGREED, by and among the Parties, subject to the approval
11 of this Court, that:

12 1. In the overall interests of judicial economy and preserving the resources of the
13 parties and the Court and for good cause shown, the parties agree and request that the Court remove
14 the following three deadlines from the calendar at this time:

- 15 • The current deadline for Plaintiffs to move for Class Certification is December 27,
16 2021.
17 • The current deadline for Initial Disclosures is December 20, 2021, and
18 • The current deadline for the Parties to file a Joint Status Report is December 27, 2021.

19 2. The Parties will meet and confer on January 5, 2022 to discuss proposed
20 rescheduled dates for these deadlines and the parties’ respective positions on the need for deadlines
21 for the FRCP 26(f) Conference, Initial Disclosure/ Discovery Plan, and Joint Status Report while
22 Valve’s anticipated motion to dismiss Plaintiff’s amended complaint is pending. No later than
23 January 10, 2022, the Parties shall report to the Court with their joint proposal as to the foregoing,
24 if possible, or alternative proposals, if an agreement is not reached.

25 3. The deadline for Defendant to answer or otherwise respond to Plaintiffs’ Amended
26 Class Action Complaint is currently January 3, 2022. In light of the intervening holidays and the

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1 issues raised by Plaintiffs' Amended Class Action Complaint, the parties agree that the time for
2 Defendant to answer or otherwise respond to the Amended Class Action Complaint should be
3 extended by twenty-five days to January 28, 2022.

4 4. This Stipulation is entered into without prejudice to any party seeking any interim
5 relief, and nothing in this Stipulation shall be construed as a waiver of any of the Defendant's or
6 Plaintiffs' rights or positions in law or in equity, or as a waiver of any defenses that the Defendant
7 would otherwise have, including, without limitation, jurisdictional defenses, except as to
8 sufficiency of service.

9 Dated: December 24, 2021

s/ Stephanie L. Jensen

Stephanie L. Jensen, WSBA #42042

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8 Putative Class*

9 Dated: December 24, 2021

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1 [PROPOSED] ORDER
2

3 IT IS SO ORDERED this 27th day of December 2021.
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7 John C. Coughenour
8 UNITED STATES DISTRICT JUDGE
9

10 Presented by:
11

12 s/ Stephanie L. Jensen
13

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